

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Case No. _____

Plaintiff,

v.

\$40,000.00 IN U.S. CURRENCY,

Defendant.

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

The plaintiff, United States of America, through its attorneys W. Anders Folk, Acting United States Attorney for the District of Minnesota, and Craig R. Baune, Assistant United States Attorney, in a civil cause of action for forfeiture, alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure.

NATURE OF THE ACTION

1. This is an action to forfeit and condemn to the use and benefit of the United States of America \$40,000.00 in U.S. Currency for violations of 21 U.S.C. § 841 *et. seq.*

THE DEFENDANT *IN REM*

2. The defendant *in rem* is \$40,000.00 in U.S. Currency (“the Defendant Property”) seized from safe deposit box No. 3748 at U.S. Bank, 4000 West Broadway Avenue, Robbinsdale, Minnesota on February 2, 2021. The Defendant Property is in the custody of the United States Marshals Service.

JURISDICTION AND VENUE

3. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the Defendant Property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345 and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. This Court has *in rem* jurisdiction over the Defendant Property under 28 U.S.C. § 1355(b). Upon the filing of this Complaint, the Plaintiff requests that the Clerk of Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b)(i), which the Plaintiff will execute upon the Defendant Property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

5. Venue is proper in the District of Minnesota pursuant to 28 U.S.C. § 1355(b)(1) because acts or omissions giving rise to the forfeiture occurred in this District, and pursuant to 28 U.S.C. § 1395 because the Defendant Property is located in this District.

FACTS

6. The Paul Bunyan Drug Task Force has been investigating drug trafficking operations, including the trafficking of heroin and fentanyl in the Bemidji area and Leech Lake Indian Reservation area by Demetrius Jermaine Durant (“Meech,” “Big Meech,” or “Durant”) and Robert Cody Mcrunels (“Mcrunels”).

7. Durant has a criminal history that includes multiple felony-level drug-related convictions, including but not limited to:

- a. a 2005 fifth-degree drug possession or sale conviction in Hennepin County, Minnesota;

- b. a 2005 second-degree drug possession or sale conviction in Hennepin County, Minnesota;
 - c. a 2011 controlled substance possession conviction involving methamphetamine and/or ecstasy in Wayne County, Michigan; and
 - d. a conviction for 2015 second-degree sale of 3 grams or more of cocaine, heroin, or methamphetamine within 90 days in Beltrami County, Minnesota.
8. Task Force Officers (“TFOs”) have conducted opioid investigations on both Durant and Mrcrunels over the past 5 years.
9. Throughout the course of this investigation, one or more Confidential Informants (“CIs”) have told law enforcement that “Meech” is sourcing Mrcrunels with heroin, methamphetamine, and fentanyl, which Mrcrunels is selling, either directly or through middlemen.
10. TFOs are aware that Durant is often referred to as “Meech” or “Big Meech.”
11. During the course of this investigation, a controlled drug buy using a CI was conducted on November 17, 2020. The CI successfully purchased approximately 1.1 grams of heroin from an individual Mrcrunels used as a middleman.
12. Officers executed a search warrant at a residential unit in Bemidji, Minnesota on January 27, 2021. The searched unit was used by both Mrcrunels and Durant, but Durant was the only person at the residence when it was searched.
13. The search of the residence revealed drug paraphernalia indicative of distribution, including multiple blenders (frequently used to “mix” or “cut” heroin and/or

fentanyl with noncontrolled substances to increase profits of the sale of drugs), digital scale, and unused distribution bags.

14. Law enforcement officers also found, under the kitchen sink, bags containing rock-like material and powder that was field tested and found to contain a detectable amount of fentanyl.

15. Subsequent laboratory analysis confirmed that the bags contained, among other things, fentanyl and heroin.

16. Durant was still on probation in Hennepin County for a controlled substance conviction when he was found at the above-described residence when it was searched.

17. Durant was transported to Beltrami County Jail.

18. While Durant was in custody at Beltrami County Jail, law enforcement personnel monitored Durant's phone calls.

19. During the phone calls, Durant gave instructions to another individual to have his son, "Little Meech," go to the bank to access a safe deposit box that was supposed to only be accessible to Durant. Durant explained where the other person could find the key to the safe deposit box.

20. The conversations prompted law enforcement officers to obtain a search warrant, which they executed, on February 2, 2021, at US Bank, 4000 West Broadway Avenue, Robbinsdale, Minnesota, for safe deposit box #3748, which was rented by Durant. The Defendant Property was seized from the safe deposit box.

21. Drug ION scans were conducted on the currency. The currency tested positive for the presence of Cocaine, Methamphetamine and THC.

BASIS FOR FORFEITURE

COUNT 1
21 U.S.C. § 881(a)(6)

22. The defendant \$40,000.00 in U.S. Currency is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6) because it was furnished or intended to be furnished in exchange for a controlled substance, constitutes proceeds traceable to such an exchange, or was used or intended to be used to facilitate a violation of the Controlled Substances Act. To the extent necessary, the provisions of 18 U.S.C. § 984 will be relied upon in support of this Count.

CLAIM FOR RELIEF

23. The plaintiff requests that the Court issue a warrant for the arrest and seizure of the Defendant in rem, that notice of this action be given to all persons who reasonably appear to be potential claimants of interests in the Defendant in rem, that the Defendant in rem be forfeited and condemned to the United States of America, that the plaintiff be awarded its costs and disbursements in this action, and for such other and further relief as this Court deems proper and just.

Dated: 7-15-2021

W. ANDERS FOLK
Acting United States Attorney

s/Craig Baune
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VERIFICATION

I, Justin A. Erickson, verify and declare under penalty of perjury as follows:

I am a licensed Peace Officer in the State of Minnesota, and have been so employed since 2002. I am employed by the Bemidji Police Department, and am currently assigned to the Paul Bunyan Drug Task Force as a Special Agent, and to the Federal Bureau of Investigation's Headwaters Task Force as a Task Force Officer. I have read the foregoing Verified Complaint *In Rem* and know the contents thereof, and the matters contained in the Verified Complaint are true to my own knowledge, except that those matters not within my knowledge are alleged on information and belief, and I believe those matters to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information provided to me by other law enforcement agencies and officers, and information I have learned by reviewing reports prepared by other law enforcement agencies and officers, as well as my investigation of this case, together with others, as a FBI Task Force Officer.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Dated: 7-15-2021

s/Justin A. Erickson
Justin A. Erickson
Task Force Officer, FBI Headwaters
Task Force